



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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September 29, 2006

VIA EMAIL AND USPS

Edward W. Kirsch, Esq.
Russell M. Blau, Esq.
Danielle C. Burt, Esq.
Bingham McCutchen, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007

RE: Complaint of CTC Communications Corp., D.T.E. 04-87

Dear Attorneys Kirsch, Blau and Burt:

Enclosed please find the first set of information requests issued by the Department of Telecommunications and Energy ("Department") to CTC Communications Corp. ("CTC") in the above-captioned matter. Please submit CTC's responses to the Department and the parties within five (5) business days of the date of this request. If you have any questions regarding these information requests, please contact me at (617) 305-3608.

Sincerely,

/s/

Paula W. Foley
Assistant General Counsel

Encls.

cc: Service list (w/encls.)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO CTC COMMUNICATIONS CORP.**

D.T.E. 04-87

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to CTC the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Verizon or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify Paula Foley, Assistant General Counsel, so that the request may be clarified prior to the preparation of a written response.

7. Please serve a copy of the responses as follows: (a) one original to Mary L. Cottrell, Secretary of the Department; (b) one copy to all parties; (c) two copies to Paula Foley; and (d) one copy to each Department staff member listed on the current distribution list.

Requests

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| DTE-CTC 1-1 | Please identify the amount of money in dispute in this matter and explain how the amount was calculated. |
| DTE-CTC 1-2 | Please identify the date upon which the parties entered into a commercial agreement for the services at issue in this matter and the date upon which the terms of the agreement pertaining to the services at issue became effective. |
| DTE-CTC 1-3 | Given the mergers of CTC, Conversent, and Choice One, please confirm that the Verizon/CTC interconnection agreement discussed in <u>CTC Communications Corp.</u> , D.T.E. 04-87-A, Order on Motion for Reconsideration (March 9, 2006), is the only interconnection agreement related to the issues in dispute in this matter. |
| DTE-CTC 1-4 | To the extent that the passage of time or intervening events, if any, have materially altered the circumstances surrounding the issues raised by the parties' March-April 2006 filings in this matter, please identify and discuss any new information or arguments related to the filings that you believe are relevant to the issues in dispute. |